

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

3M Company, 3M Innovative Properties Company, and
3M Health Information Systems, Inc.,

Plaintiffs,

v.

International Business Machines Corporation d/b/a
Watson Health,

Defendant.

ORIGINAL

JAN 31 2020

Civil Action No. 20-cv-00847

JURY TRIAL DEMANDED

**PLAINTIFFS' MOTION TO SEAL PORTIONS OF THE COMPLAINT, PORTIONS OF
EXHIBIT 2 TO THE COMPLAINT, AND THE ENTIRETY OF EXHIBIT 3 TO THE
COMPLAINT**

Plaintiffs 3M Company, 3M Innovative Properties Company, and 3M Health Information Systems, Inc. ("Plaintiffs") hereby respectfully move this Court for entry of an order sealing portions of Plaintiffs' Complaint, portions of Exhibit 2 to the Complaint, and the entirety of Exhibit 3 to the Complaint. The reasons supporting Plaintiffs' Motion are set forth in the accompanying Declaration of Susan M. Salek and in the Memorandum of Law.

WHEREFORE, Plaintiffs respectfully request that the Court enter the proposed Order sealing portions of the Complaint in the above-captioned matter, portions of Exhibit 2 to the Complaint, and the entirety of Exhibit 3 to the Complaint.

Dated: January 31, 2020
New York, New York

Respectfully submitted,

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